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October 25, 2019

BY ECF

Hon. Raymond J. Dearie
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Windward Bora, LLC v. Jain, et al.*
18-CV-1844 (RJD) (JO)

Dear Judge Dearie:

We represent Defendant PCN, LLC (“PCN”). Pursuant to the September 20, 2019 Order, we are providing the status of discovery in Plaintiff’s State Court Expungement Action. At Plaintiff’s request, the preliminary conference (at which a discovery schedule will be set up) was adjourned from September 24, 2019 to October 30, 2019. Additionally, PNC Bank, the entity that filed the satisfaction or mortgage, appeared and has until October 31, 2019 to respond PCN’s cross-claims in the State Court Expungement Action. Given the foregoing, it is respectfully suggested that the next status report be required on or about December 13, 2019.

Thank you for your consideration.

Respectfully submitted,

Edward R. Finkelstein
Edward R. Finkelstein

cc: Danielle P. Light, Esq. (BY ECF)
Thomas R. Dominczyk, Esq. (BY ECF)